UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

-against
GREGORY COLBURN, ET AL,

Defendants.

NONPARTY UNIVERSITY OF SOUTHERN CALIFORNIA'S ASSENTED-TO MOTION FOR LEAVE TO FILE OPPOSITION TO DEFENDANTS' MOTION TO COMPEL UNDER SEAL

Nonparty University of Southern California ("USC"), by and through undersigned counsel, hereby respectfully moves this Honorable Court for leave to file under seal its Opposition to Defendants Gamal Abdelaziz, Elisabeth Kimmel and John Wilson Motion to Compel USC's Response to February 7, 2020 Subpoena (ECF #716).

Because the defendants sought and were granted leave to file the Motion to Compel *ex* parte and under seal, USC also seeks leave to file its Opposition and any further pleadings regarding the Motion to Compel under seal as well.

WHEREFORE, USC respectfully requests that this Court allow it leave to file its Opposition under seal.

COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

Undersigned counsel conferred with counsel for Defendants Gamal Abdelaziz, Elisabeth Kimmel and John Wilson who assent to USC filing its Opposition under seal.

Respectfully submitted, UNIVERSITY OF SOUTHERN CALIFORNIA, By its attorneys,

/s/ Debra Wong Yang

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Dated: October 29, 2020

CERTIFICATE OF SERVICE

I, hereby certify that this document filed through ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent those indicated as nonregistered participants on October 29, 2020.

/s/ Anthony E. Fuller

Anthony E. Fuller